

### REMARKS

Claims 1 to 5 were rejected under 35 U.S.C. § 103 as unpatentable over Miyoshi in view of Puschnerat.

Miyoshi discloses an offset printing press in a vertical alignment. Each cylinder of a printing unit 1a, 1b, 1c, 1d is driven via gears 9, 10, and a common drive shaft 8, as shown in Figs. 4 and 5. The actual drive for the shaft 8 is not shown.

Pushnerat discloses an offset printing unit with a motor 26 connected to the plate cylinder 2 and another motor 27 connected to the plate cylinder 3. The plate cylinder 2 and blanket cylinders 4 and 6 are driven by motor 26. Drive 27 may drive the plate cylinder 3.

Claim 1 of the present invention recites a first printing unit including a first and a second plate cylinder and a first and second blanket cylinder, all being driven by a common drive motor; and a second printing unit with a first plate cylinder driven by a first drive motor, and a second plate cylinder, first blanket cylinder and second blanket cylinder all driven by a second drive motor. The first and second printing units print the same web.

Thus two separately driven and separately configured printing units are required by claim 1.

In Miyoshi, all print units 1a, 1b, 1c, 1d are driven by common drive shaft 8 (see Figs. 4 and 5).

Pushnerat discloses a single print unit only with two drives.

It is respectfully submitted that it would not have been obvious to one of skill in the art to replace only one print unit of Miyoshi with the Puschnerat drive, and leave the other print units driven by common shaft 8.

First, there is no teaching or motivation to provide the shaft press of Miyoshi with the Pushnerat shaftless drives at all. Shaft presses, where the printing units are interconnected by a shaft, differ significantly from the shaftless presses of Pushnerat in their control systems: shaft

presses are controlled by driving all printing units mechanically, while the shaftless press of Pushnerat drives each printing units electronically and must synchronize them. It would not have been obvious to one of skill in the art to have placed the drives of Pushnerat in the shaft press of Miyoshi. It is noted that Miyoshi shows no motor at all.

Second, even if one of skill in the art somehow would have provided the drives of Pushnerat to the Miyoshi press (and it is respectfully submitted they would not have), it is respectfully submitted that that person would have eliminated the entire shaft and provided each printing unit with the drive motors of Pushnerat, as would have been required to meet the limitations of claim 1. In other words: there is no teaching or motivation for one of skill in the art to have modified just one of the print units of Miyoshi with Pushnerat as would have been required, and leave a common drive shaft for the others. The mixing of such a shaft and shaftless drive in one press would cause control and timing issues difficult to address.

Third, if the provided motivation that one of skill in the art might want to facilitate plate exchange operation were true (and there appears no need or reason in Miyoshi for this), that person would have provided the Pushnerat drives for each printing unit, not just one printing unit.

It is also noted that Miyoshi shows no motor at all.

The present invention provides different shaftless drives for two different printing units of a single press, with the second printing unit having two drive motors. This advantageously permits a flying imprinter operation with only two drive motors while allowing for high quality printing, as stated in the present specification at page 3, line 12 et seq. Neither Pushnerat nor Miyoshi address this advantage.

Withdrawal of the rejection to claim 1 and its dependent claims is respectfully requested.

With further respect to claim 2, the Office Action does not address the limitation of the third printing unit first plate cylinder and the second printing unit plate cylinder being

“engageable or disengageable with their associated blanket cylinders in alternation” as claimed in claim 2. Neither Pushnerat nor Miyoshi discloses this feature.

Withdrawal of the rejection to claim 2 for this reason as well is respectfully requested.


CONCLUSION

It is respectfully submitted that the application is now in condition for allowance, and applicants respectfully request such action.

Respectfully submitted,

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